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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAMES GOULD,

Plaintiff,

vs.

COUNTY OF ROCKLAND,
SUSAN SHERWOOD, sued in her individual
capacity, JACQUELINE STORMES, sued in her
individual capacity, KATHLEEN
TOWER-BERNSTEIN, sued in her individual
capacity, and JILL LAGNADO, sued in her
individual capacity,

Defendants.
-----X

NOTICE OF MOTION

07 Civ. 2837 (CLB)

ECF Case

PLEASE TAKE NOTICE that at a time to be announced, defendants County of Rockland, Susan Sherwood, Jacqueline Stormes, Kathleen Tower-Bernstein, and Jill Lagnado (hereinafter collectively, "Defendants"), by their attorneys, Patterson Belknap Webb & Tyler LLP, will move the Court, before the Honorable Charles L. Brieant, in Courtroom 218 of the United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, for the following relief:

1. Granting judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c) in favor of Defendants on the complaint because plaintiff fails to state a claim upon which relief can be granted;

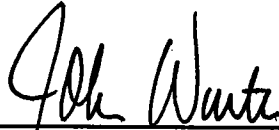
2. Staying discovery pending the resolution of Defendants' motion for judgment on the pleadings; and

3. Granting such other and future relief as the Court deems just and proper.

This motion is based upon the files, records and proceedings herein, including the Complaint and Answer, Affirmative Defenses, and Counterclaims, with exhibits, attached hereto at Tabs 1 and 2, and the accompanying Memorandum of Law in Support of Defendants' Motion for Judgment on the Pleadings and to Stay Discovery.

Dated: May 31, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Winter", is written over a horizontal line.

John D. Winter, Esq.

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